



STATE OF UTAH  
NATURAL RESOURCES & ENERGY  
Oil, Gas & Mining

Sam  
Scott M. Matheson, Governor  
Temple A. Reynolds, Executive Director  
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

August 13, 1982

Mr. James Godlove  
Director of Environmental Affairs  
White River Shale Oil Corporation  
Suite 500 Prudential Building  
115 South Main Street  
Salt Lake City, Utah 84111

Attention: Ralph DeLeonardis

RE: Stipulations for Conditional  
Approval  
White River Shale Oil Project  
ACT/047/017  
Uintah County, Utah

Dear Mr. Godlove:

The Division staff has reviewed your response to our request for additional information. It is recommended that a conditional approval be given with the understanding that all of the stipulations must be met to the satisfaction of the Division prior to a final approval being issued. In this response you will find conditional stipulations as well as further informational needs, with deadline dates.

Upon final completion of all of the responses, the Division requests that a final complete document be presented as an addendum to White River's Mining and Reclamation Plan. This document should include a summary of dates of submittals that are referenced in the mine plans and responses. The dates for the breakdown of the bonding increments for Phase I are also requested.

The Division reserves the right to future comment on several responses. This review obviously does not include a response to the questions that refer to submittals made on August 16, 1982, which may lead to further recommendations.

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Following are the Division's responses or stipulations to White River's responses submitted July 30, 1982. (They are listed chronologically and numbered according to the July 30 submittal).

- Question 11: Further data about estimated cut and fill data will be submitted by October 15, 1982.
- Question 14: The Division requests detailed subsidence mitigation plans by September 15, 1982. This plan should be determined now rather than when the stipulation arises as your comments indicated.
- Question 18: The disposal of ripped road pavements is contingent upon a detailed evaluation of costs for disposal. The development of the detailed costs is requested by October 15, 1982 with the conditional stipulation of approval by the BIM and OSO.
- Question 23: The Division still feels that toxicity is a potential problem. Any further recommendations and suggestions will be discussed at a later date.
- Question 25: It should be understood that additional requirements may become necessary and more specific details needed at a future date earlier than specified on the response regarding the permanent closure of the portals, shafts, and declines.
- Questions 30 & 31: A conditional stipulation requires the submittals of updates of annual Operations and Progress Reports within the first quarter of the new year. It should be reiterated that all reports should be submitted as soon as they are available to the Division.
- Question 34: As a conditional stipulation, White River needs to agree to the sealing of the shaft as a part of the reclamation activities during abandonment in cooperation with the Oil Shale Office or any other federal agency. This should be submitted by October 15, 1982.
- Question 36: White River should understand that variance requests should be submitted 60 days prior to approaching the Board for approval such as the timing for the decommissioning plan.
- Question 37: The Division reserves the right to future comment. More comments may arise before the Board hearing.
- Question 38: The Division reserves the right to future comment. It should be understood that any plans for work in the spent shale area (or any area at any time) should be submitted 60 days prior to work, i.e. in sufficient time for review.

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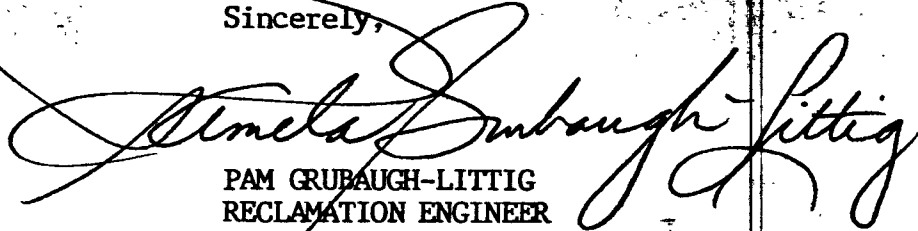
Question 39: The Division is required to review any additional erosion control measures prior to implementation.

Question 40: White River should commit to submit any experimental test plot data.

In summary, most of the stipulations refer to WRSOC's commitment to submit plans prior to implementation or approval by the Board. Some of the stipulations have deadlines which we believe are reasonable and can be met. We hope that these responses can be answered in a timely manner before the Board hearing on August 26, 1982.

Please feel free to call Jim Smith, Tom Tetting, or myself, if you have any questions.

Sincerely,

A large, stylized handwritten signature in cursive script, reading "Pamela Grubaugh-Littig". The signature is written in dark ink and is positioned above the typed name and title.

PAM GRUBAUGH-LITTIG  
RECLAMATION ENGINEER

PGL/rb